TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 95OPWE038
to be issued to:

DCP Midstream, LP
Greeley Gas Processing Plant
Weld County
Source ID 1230099

Prepared by Lisa Clarke
June – October 2008; May 2009

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. The original Operating Permit was issued May 1, 1999 and expired on May 1, 2004. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application received May 1, 2003 and additional information received March 27, 2007; June 27, 2007; July 25 & 26, 2007, October 25 & 31, 2007; November 8, 2007; February 29, 2008; March 28, 2008; June 12, 2008 and July 11, 2008; August 6, 2008; December 22, 2008; January 2, 2009, April 9, 2009; previous inspection reports, and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at http://www.cdphe.state.co.us/ap/Titlev.html.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

In addition to the changes requested by DCP Midstream in the renewal application, the Division has included changes to make the permit consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

II. SOURCE DESCRIPTION

The Greeley Gas Processing Plant, classified as a natural gas processing plant as set forth under Standard Industrial Classification 1321, consists of two operations, a gas processing skid and a fractionation assembly. The gas-processing skid utilizes straight refrigeration coupled with the Joule-Thompson process to create a natural gas liquid (NGL) product and a residue gas stream. The residue gas is recompressed and routed to the sales pipeline. The NGL product is sent to the fractionation assembly. Fugitive volatile organic compounds (VOC) emissions from the natural gas processing skid are subject to the provisions of 40 CFR Part 60 Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants

The fractionation assembly separates the NGL product into ethane, propane, butane, isopentane and natural gasoline streams. Each of these streams is stored in pressurized bullet tanks prior to transport off-site by truck. Triethylene glycol (TEG) and ethylene glycol (EG) systems operate to dehydrate the ethane gas created by the fractionation process. The triethylene glycol unit is subject to the area source provisions of 40 CFR 63 Subpart HH. Fugitive VOC emissions from the fractionation towers and associated piping are subject to the provisions of 40 CFR Part 60 Subpart KKK.

The process uses compressors powered by eight (8) reciprocating internal combustion engines. Six (6) 1100-hp Waukesha L7042GSI engines can be used for either inlet or residue compression. For refrigeration, one (1) 896-hp Waukesha L-7042G engine and one (1) 1100-hp Waukesha L-7042GSI engine are used. Other equipment includes two (2) natural gas-fired heaters to heat an oil heating medium, pressurized product truck loadout rack (including propane, butane, B-G mix, Y-grade, isopentane, natural gasoline, and condensate), and a number of storage tanks of various sizes containing a variety of materials. The vapors from the condensate tank flash and liquid loadout are routed back to the inlet for processing by a gas-driven VRU (125-hp Waukesha F-11G).

The address of the Greeley Gas Processing Plant is 3009 West 44th Avenue, Greeley (SE¼ & SW¼ of SW¼ of Section 25, T5N, R66W). The plant is located at the southern edge of Greeley near Highway 85. The area in which the plant operates is designated as attainment for all criteria pollutants except ozone. It is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16. This facility is located in an area classified as attainment/maintenance for carbon monoxide (CO). Under that classification, all SIP-approved requirements for CO will continue to apply in order to prevent backsliding under the provision of Section 110(1) of the Federal Clean Air Act. Wyoming is an affected state within 50 miles of the plant. Rocky Mountain National Park is a Federal Class I designated areas within 100 kilometers of the plant.

MACT Applicability

HHH- Natural Gas Transmission and Storage

This facility is not a natural gas transmission and storage facility as described in 40 CFR Part 63 Subpart HHH, "National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage". The facility is a natural gas processing plant. In addition, this facility is a true minor source of Hazardous Air Pollutants (HAPs). Therefore, this facility is not subject to this MACT.

HH – Oil and Natural Gas Production Facilities

Although this facility is a true minor of HAPs, there are two dehydrators present. However, one of the dehydrators is an ethylene glycol dehydrator (AIRS Point 111 or DCP Point P130) and not subject to the MACT HH. The other dehydrator, a triethylene glycol dehydrator at the facility (AIRS Point 116 or DCP Point P136) is subject to the area source requirements of the MACT HH and must keep records of actual average benzene emissions using either a quarterly gas analysis and GRI-GLYCalc^{TM} Version 3.0 or higher or a direct measurement method.

ZZZZ – Stationary Reciprocating Internal Combustion Engines

The final rule for RICE was published in the Federal Register on June 15, 2004. Under the rule, for production field facilities, only emissions from glycol dehydrators, storage vessels with the potential for flash emissions, reciprocating internal combustion engines and combustion turbines need to be aggregated to determine if the facility is a major source for HAPS. An analysis was conducted to determine HAP emissions from the equipment at this facility. Total HAP emissions based on permitted production were calculated to be 9.35 TPY, with no single HAP exceeding 7 TPY. This facility is a true minor source of HAPs. Therefore, the major source provisions of the RICE MACT do not apply to the Greeley natural gas processing plant.

The area source rules for this MACT were published in the Federal Register on January 18, 2008. These rules do not currently cover existing RICE at area sources. According to 40CFR 63.6590(a)(2)(iii), the new or reconstructed date for this MACT is on or after June 12, 2006. All of the engines at the Greeley facility were constructed before the applicable date. Therefore, the area source provisions of the RICE MACT do not apply to the Greeley natural gas processing plant.

NSPS Applicability

JJJJ – Spark Ignition Internal Combustion Engines

According to 40 CFR 60.4230(a)(4)(i), the applicable date for NSPS JJJJ is June 12, 2006. All of the engines at the Greeley facility were ordered (i.e. commenced construction) before the applicable date. Therefore, the NSPS JJJJ provisions do not apply to the Greeley facility.

State Regulations

Regulation 7

The Greeley facility is located in the 8-hour Ozone Control Area. Therefore, the provisions of Regulation 7, Section XVI.A apply to this facility. All engines greater than 500 HP (Engines P122, P123, P124, P125, P126, P128, P129, and P127) must install air pollution controls. All of the applicable engines are rich burn. Therefore, as defined by Section XVI.B, the required control technology is a non-selective catalyst reduction combined with an air fuel controlled, which had to be employed by May 1, 2005. The requirements in XVII.E are either for newly constructed or relocated engines on or after January 1, 2008 or to employ the above air pollution controls statewide at a later date. Therefore, the requirements in XVII.E do not apply to the Greeley facility.

Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold (100 tons per year). They are therefore subject to the provisions of the CAM program set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV.

P122, P123, P124, P125, P126, P128, P129 – Waukesha Model L-7042GSI ICE

The primary purpose of the CAM program is to supplement or enhance the Operating Permit monitoring requirements as necessary to adequately demonstrate compliance. The exhaust gas temperature on each engine is monitored continuously with thermocouples. The pressure drop across the catalyst is measured in inches of water with a continuously operating manometer. The proper performance envelopes for the control device parameters being monitored are any temperature between 750 °F and 1250 °F and a pressure drop within three inches of water.

The CAM provisions require a source to monitor at least one indicator of performance per control device and to perform at least one parameter observation per 24 hours. DCP selected to

continuously monitor the exhaust gas outlet temperature and pressure drop across the catalyst. The daily measurement frequency satisfies the minimum CAM requirement.

Emissions

The following table presents the facility wide Potential To Emit (PTE):

Pollutant	Potential to Emit (tpy)	Actual (tpy) Data Year 2007
NOx	242.6	241.6
VOC (including fugitive VOCs)	138.1	114.0
CO	242.0	233.3
HAPs (for informational purposes only)	12.2	3.39

The potential and permitted emissions classify this plant as a synthetic minor source with respect to Prevention of Significant Deterioration (PSD) requirements. All of the engines have non-selective catalytic reduction units and air/fuel ratio controllers to controls. The actual emissions from 2007 for VOCs and HAPs are lower than the PTE because the addition of the ethylene glycol and triethylene glycol dehydrator emissions to the permit, both recently discovered to be above APEN thresholds in a rich/lean gas analysis and subsequent GLYCalc runs.

This plant is located in an area designated as attainment for all pollutants except ozone. Based on the information provided in the Title V application, this facility is categorized as a NANSR major stationary source (Potential to Emit of VOC or NOx $\geq$ 100 Tons/Year). Future modifications at this facility resulting in a significant net emissions increase (see Reg 3, Part D, Sections II.A.26 and 42) for VOC or NOx or a modification which is major by itself (i.e. a Potential to Emit of $\geq$ 100 TPY of either VOC or NOx) may result in the application of the NANSR review requirements.

Based on the information provided by the applicant, this source is categorized as a minor stationary source for PSD as of the issue date of this permit. Any future modification which is major by itself (Potential to Emit of $\geq$ 250 TPY) for any pollutant listed in Regulation No. 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

Emissions Sources

The following sources are specifically regulated under terms and conditions of the Operating Permit for this plant:

Internal Combustion Engines:
P122, P123, P124, P125, P126, P128, P129 – Waukesha L-7042 GSI 1100 HP w/ NSCR
P120 – Waukesha F-3521 GSI 450 HP w/NSCR
P121 – Waukesha F-11G 125 HP w/NSCR
P127 – Waukesha L-7042G 896 HP w/NSCR
Condensate Tank Truck Loadout Rack (P128)
Natural Gas Fired Heaters:
P139 – 29.0 MMBtu/hr Hot Oil Heater
P132 – 15.0 MMBtu/hr Hot Oil Heater
Fugitive VOC Emissions from Fractionation & NGL Gas Processing Plants (P133)
Natural Gas Liquids (NGL) Truck Loadout Rack (P135)
Ethylene Glycol Regeneration Unit (P130)
Triethylene Glycol Regeneration Unit (P136)

Accidental Release Program (112(r))

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provisions must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act). The Risk Management Plan required by the Act was submitted to the appropriate authority and/or a designated central location by June 20, 1999 and revised accordingly.

Emission Factors

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Obviously, factors dependent on the fuel sulfur content or heat content cannot be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.

III. DISCUSSION OF MODIFICATIONS MADE

Source Requested Modifications

- DCP requested that the Responsible Official and Facility Contact person be updated April 2, 2008 and via various telephone conversations in June 2008.

- The company name has been changed from Duke Energy Field Services, LP to DCP Midstream, LP.

- **Internal Combustion Engines**
  DCP requested that the tri-annual reporting period be changed to a less stringent timeframe. Since the submittal of the renewal application, the Division has changed reporting periods to either semi-annual or quarterly. The permit has been updated accordingly.
  DCP also requested in the renewal submittal that engine P121, the Waukesha F1197GU was labeled incorrectly, and should be a Waukesha F-11G. This has been remedied throughout the permit.

- **P138 – Condensate Truck Loadout**
  DCP requested that this source be removed from the permit since the facility no longer has atmospheric condensate tanks. Emissions from pressurized condensate tank truck loadout are included under P137.

- **P139 – Natural Gas Fired 29.0 MMBtu/Hr Hot Oil Heater**
  DCP applied for the cancellation of P131, the 22.3 MMBtu/Hr Hot Oil Heater Natural Gas Fired, to be replaced with P139, a natural gas fired 29.0 MMBtu/Hr Hot Oil Heater, with first a Construction Permit application submitted October 29, 2007 and then after various phone and email conversations, a minor modification application submitted June 17, 2008. A minor modification completeness letter was sent on June 26, 2008. DCP submitted a request to modify this source on January 2, 2009 because the original modification heat was based on the maximum output heat and needs to be based on the maximum heat input. This new heater has been incorporated into the Operating Permit.

  1. Applicable Requirements – A fuel usage limit of 292.83 MMScf/year. Compliance limits for NO_x and CO are 14.64 and 12.30 tons per year, respectively. This source is also subject to the recordkeeping and reporting requirements for 40 CFR Part 60 Subpart Dc.

  2. Emission Factors – The emission factors for this heater were obtained from AP-42 Table 1.4-2 and adjusted for the fuel heat content of 1040 Btu per standard cubic feet of gas. These emission factors are listed in the table below:

Pollutant	Reported Emission Factor

NO_x	100 lbs/MMScf
CO	84 lbs/MMScf
PM/PM_{10}	7.6 lbs/MMScf
VOC	5.5 lbs/MMScf

3. Monitoring Plan – The emissions of each pollutant and fuel usage shall be calculated by the end of the subsequent calendar month. A twelve (12) month rolling total of emissions shall be maintained to verify compliance with the long-term emission limitation. By the end of the new calendar month, a total shall be calculated for the previous 12 calendar months, and compliance determined and recorded. All calculations and compliance determinations shall be made available for Division review upon request. The source must also keep daily fuel record keeping requirements per Subpart Dc and is subject to Regulation No. 6, Part A, Subpart A, General Provisions.

- **P133 – Fugitive VOC Emissions from Fractionation and Natural Gas Liquids (NGL) Processing Plants**
  DCP requested that the fugitive emissions from the fractionation and NGL plants be combined and increased based on the increasing VOC concentration in the plant inlet gas with a revised APEN received April 9, 2009, which has been incorporated into the Operating permit. The NGL plant fugitive VOC emissions were previously listed under P137 or AIRS ID 123/0099/031.

  1. Applicable Requirements – Compliance limit of 24.1 tons of volatile organic compounds per year. In addition, this source is subject to NSPS Subpart KKK (State Regulation 6, Subpart KKK) and State Regulation No. 6, Part A, General Provisions (NSPS General Provisions).

  2. Emission Factors – The NGL fugitive emissions are calculated using the appropriate emission factors and equations from the *Protocol for Equipment Leak Emission Estimates, EPA, November 1995, EPA-453-R-95-017*.

  3. Monitoring Plan – The emissions of fugitive shall be estimated by performing an actual physical of the existing components within ninety (90) calendar days of the issuance of the renewal operating permit and conducting a plant inlet gas analysis at least once per calendar year. An actual physical hard count of the existing components shall be performed at least once every five years.

- **P135 – Natural Gas Liquids (NGL) Truck Loadout Rack**
  DCP requested that the multiple throughput limits for each product produced by the NGL truck loadout rack be consolidated into a single throughput limit with a request received February 29, 2008. The single throughput limit is based on the worst-case scenario in which

100% of the product throughput is B-G Mix (the product with the highest specific gravity and liquid density). This request has been incorporated into the Operating permit.

1. Applicable Requirements – Compliance limit of 43.15 tons of volatile organic compounds per year and single throughput limit of 560 million gallons per year.

2. Emission Factors – The NGL truck rack emissions are calculated using mass balance equations and the ideal gas law.

3. Monitoring Plan – The VOC emission and gallons of NGL shall be calculated on a rolling twelve (12) month basis. A maintenance plan shall also be developed that outlines procedures to locate and repair equipment leaks to minimize fugitives and kept on-site and made available for Division review upon request.

- **P130 – Ethylene Glycol Regeneration Unit**

DCP applied for this unit to be added to the Operating Permit on July 25, 2007. This unit was identified as an insignificant activity, but after the rich-lean gas analysis did not provide credible results, DCP ran a GLYCalc model and found that this source is no longer insignificant. DCP requested the gas throughput for this unit be increased on January 2, 2009 due to increased activity in the field. This request has been incorporated into the Operating Permit.

1. Applicable Requirements – Compliance limit of 6.50 tons of volatile organic compounds per year and a gas throughput limit of 12,045 million standard cubic feet per year as well as a glycol circulation rate limitation of 6.0 gallons per minute.

2. Emission Factors – GLYCalc Version 4.0 or higher combined with an extended quarterly gas analysis estimate the emissions.

3. Monitoring Plan – The VOC and HAP emissions shall be calculated on a rolling twelve (12) month total using GLYCalc and an extended gas analysis. The gas throughput shall be recorded similarly. The hours of operation shall be recorded and used in the GLYCalc runs.

- **P136 – Triethylene Glycol Regeneration Unit**

DCP applied for the unit to be added to the Operating Permit on August 6, 2008. This unit was identified as an insignificant activity, but after the rich lean gas analysis was run to verify emissions, the VOC emissions were estimated at 1.5 tons per year, which is over the APEN threshold for the Denver ozone non-attainment area, making this source no longer insignificant. The monitoring method for this unit will be semi-annual rich/lean glycol analyses, requested on December 22, 2008. DCP requested the gas throughput and emission limits for this unit be increased on January 2, 2009. These requests have been incorporated into the Operating Permit.

1. Applicable Requirements – Compliance limit of 9.92 tons of volatile organic compounds per year and a gas throughput limit of 1460.0 million standard cubic feet per year as well as a glycol circulation rate limitation of 1.0 gallons per minute. This unit is subject to the area source requirements of the MACT HH.

2. Emission Factors – Semi-annual rich/lean glycol analyses.

3. Monitoring Plan – The owner or operator shall utilize manufacturer recommendations. The VOC and HAP emissions shall be calculated on a rolling twelve (12) month total using rich/lean glycol analyses and corresponding calculations performed semi-annually. The gas throughput shall be recorded similarly. Annual actual average benzene emissions shall be determined using rich/lean glycol analyses and corresponding calculations.

CAM Plan Review

DCP included a CAM Plan in the original renewal application dated May 1, 2003. The originally proposed plan was to monitor catalyst exhaust gas temperature and oxygen concentrations into the catalyst. The Division has since developed a CAM Plan for similar facilities with like-kind engines based on the RICE MACT. The Division approved CAM Plan contains two indicators: temperature of the exhaust gas into the catalyst and the pressure drop across the catalyst. The indicator ranges are a temperature between 750º F and 1250º F and ± 3 inches of water, respectively. The temperature into the catalyst shall be measured at a minimum daily and the pressure drop recorded once per month.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, included comments made by the EPA on other Operating Permits, as well as correct errors or omissions identified durings inspections and/or discrepancies identified during review of this renewal.

These changes are as follows:

Page following Cover Page

It should be noted that the monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However,

it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

Section I – General Activities and Summary

- The description of the source was updated to reflect the current status of the facility.
- The attainment status of Weld County was updated to reflect the current ozone nonattainment status of this area.
- Changed Condition 4 to Condition 2, Condition 2 to Condition 3, and Condition 3 to Condition 4 to reflect other recently issued permits.
- Condition 3 was updated to reflect the correct Construction Permits incorporated into the Operating Permit. **It is important to note that Construction Permit 97WE0363 was never issued and therefore invalid for purposes of this Operating Permit.**
- In Condition 4, General Condition 3.g (new general condition for general provisions) was added as a State-only requirement.
- The language for the alternative operating scenario for temporary engine replacement was updated to reflect current language (10/8/08 version). The AOS table was also updated to reflect the engines at the facility that are applicable.
- Added a "new" Section 5 for CAM.
- The previous Section 5, outlining the applicability and description of Subpart KKK requirements, was deleted due to repetition.
- Summary table 6.1 has been updated.

Section II – Specific Permit Terms

- This section was updated significantly. Section II.1 notes that all these engines are subject to CAM. Section II.2 was updated to include the three smaller engines at the site not subject to CAM. .

Section II.1 – Internal Combustion Engines – Subject to CAM

- All serial numbers relating to the engines have been removed from the permit except in Table 6.1 to prevent future confusion. Like-kind engine replacements received on October 25, 2007 and March 28, 2008 have been incorporated into the Operating Permit.
- Condition 1.2 was changed from Fuel Use to Natural Gas Consumption.
- Condition 1.5 was removed and updated to be Condition 11 later in Section II.
- Condition 1.5 – Added good operation and maintenance requirement.
- Condition 1.6 was removed due to overlap with the CAM requirements.
- Condition 1.6 – Put in operating hour recordkeeping.
- Condition 1.7 – Updated condition to have a monthly monitoring interval instead of weekly per the Title V Monitoring Requirements for Engines with Control Devices.
- Condition 1.8 – Added CAM requirements.
- Condition 1.9 – Added state-only requirement for control of emissions from stationary and portable engines in the 8-hour ozone nonattainment area.
- Removed compliance test requirements as initial testing has long since been completed.

Section II.2 – Other On-site Engines (P120, P121, and P127)

- Condition 2.2 was changed from Fuel Use to Natural Gas Consumption.
- Condition 2.5 was removed and updated to be Condition 11 later in Section II.
- Condition 2.5 – Added good operation and maintenance requirement.
- Condition2.6 was removed and updated to be Condition 14 later in Section II.
- Condition 2.6 – Put in operating hour recordkeeping.
- Condition 2.7 – Updated condition to have a monthly monitoring interval instead of weekly per the Title V Monitoring Requirements for Engines with Control Devices.
- Condition 2.8 – Added NSCR (Catalytic Convertor) monitoring requirements.

- Condition 2.9 – Added state-only requirement for control of emissions from stationary and portable engines in the 8-hour ozone nonattainment area, **applicable to engine P127 only**.

- Removed compliance test requirements as initial testing has long since been completed.

- Since Section II.2 incorporated all three engines, previous Sections II.3 and II.4 have been deleted.

- Section II.5 - Condensate Tank Truck Loadout – was deleted.

Section II.3 – P139 – Natural Gas Fired 35.1 MMBtu/Hr Hot Oil Heater

- Condition 3.1 – Added natural gas as fuel requirement.

- Condition 3.2 – Added emission and fuel usage limits and tracking requirements (NO_x and CO only).

- Condition 3.3 – Inserted opacity condition.

- Condition 3.4 – Incorporated actual annual emission reporting for VOC and SO_2.

- Condition 3.5 – Added 40 CFR Part 60 Subpart Dc fuel recordkeeping and recording requirements.

- Condition 3.6 – Inserted Regulation No. 6, Part A, Subpart A, General Provisions requirements.

Section II.4 – P132 – Natural Gas Fired 15.0 MMBtu/Hr Hot Oil Heater

- This section was previously Section II.7. The underlying permit has been updated (90WE514-2).

Section II.5 – P133 – Fugitive VOC Emissions from Fractionation and Natural Gas Liquids (NGL) Processing Plants

- This section was previously Sections II.8 and II.9. The points have been combined and emissions increased because the same conditions apply to the fugitive emissions at both facilities and DCP wanted increased emissions to account for additional potential leaks. This update was made per DCP request for an emissions increase on July 26, 2007 and another request to combine the points on April 9, 2009. The underlying permit has been updated (90WE048-1) and the other canceled (96WE295). The language for this source has been updated to be more consistent with recently issued permits.

- Condition 8.4 (would have been Condition 5.4) has been deleted due to repetition.

Section II.6 – P135 – Pressurized Product Truck Loadout Rack

- This section was previously Section II.10. It has been updated per DCP request on February 29, 2008 and to be more consistent with recently issued permits.

Section II.7 – P130 – Ethylene Glycol Regeneration Unit

- This section has been added to the permit per DCP request on July 25, 2007 and updated per DCP request on January 2, 2009.
- Condition 7.1 – Added VOC emission limitation and quarterly calculation using GLYCalc based on an extended gas analysis.
- Condition 7.2 – Added gas throughput limit and recording requirement.
- Condition 7.3 – Added good operation and maintenance requirement.

Section II.8 – P136 – Triethylene Glycol Regeneration Unit

- This section has been added to the permit per DCP request on August 6, 2008 and updated per DCP request on December 22, 2008 and January 2, 2009.
- Condition 8.1 – Added VOC emission limitation and semi-annual calculation using rich/lean glycol analysis sampling.
- Condition 8.2 – Added gas throughput limit and recording requirement.
- Condition 8.3 – Added good operation and maintenance requirement.
- Condition 8.4 – Incorporated MACT HH area source requirements.
- Condition 8.5 – Inserted rich/lean glycol analysis sampling requirement on a semi-annual basis.
- Condition 8.6 – Added MACT HH requirement of determining actual annual average benzene emissions estimation using either GLYCalc or direct benzene measurements and corresponding calculation.

Section II.9 – "new" section – Added CAM requirements.

Section II.10 – Portable Monitoring (version 6/1/2006)

- This section (previously mentioned in various places throughout the permit) was moved for organizational purposes and updated to the most recent version.

- Removed conditions Compliance Testing, Documents Required, Insignificant Activities, Reporting, Upset Conditions and Breakdowns, and General Operations (previously sections II.12, 13, 14, 15, 17, and 18).

- Updated fuel based emission factors table in Calculations section (now Section II.14).

Section III, Permit Shield

- Updated applicable emission unit descriptions and numbers.

Section IV

Updated General Conditions to version 02/20/2007.

Appendix A

- Updated list of insignificant activities, detailing specific units as well as the generic list. Removed ethylene glycol unit – no longer insignificant.

Appendices B & C

- Updated to 2/2/2007 version.

- Updated report tables to current facility units.

Appendix D

- Updated EPA address.

Appendix G – "new" appendix

Added Compliance Assurance Monitoring Plan.

Appendix H – "new" appendix

Added Applicability Reports (ver. 11/8/08)